



Docket No: CIT/K-0107

PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of

Jin Soo LEE and Hyeon Jun KIM

Continuation of Serial No. 09/493,038.

Confirm. No: Unassigned

Filed: August 18, 2003

For: METHOD OF SEARCHING OR BROWSING MULTIMEDIA DATA AND
DATA STRUCTURE

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: Group Art Unit: Unassigned
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: Examiner: Unassigned
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SECOND DECLARATION UNDER 37 C.F.R. 1.132

U.S. Patent and Trademark Office
Customer Service Window, Mail Stop Amendment
2011 South Clark Place
Crystal Plaza Two, Lobby, Room 1B03
Arlington, Virginia 22202

Sir:

I, Jin-Soo Lee, hereby declare that:

1. I graduated from a University of Dong-Kook University, Seoul, Republic of Korea in 1995 where I received a BS degree in Computer Science engineering.

2. I graduated from Pohng University of Science and Technology, Republic of Korea in 1995 where I received an MS degree specialized in the area of Pattern Recognition and Neural Networks.

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3. Since 1997, I have been employed at LG Electronics Inc. as a Senior Engineer, where my work principally focused on digital signal and image processing.

4. Throughout my academic and professional career, I have published articles, including: "Highly Accurate Recognition of Printed Korean Characters through an Improved Two-Stage Classification Method," Pattern Recognition 32 (1999) 1935-1945.

5. I am familiar with the level of ordinary skill in the art of data storage, processing, and searching systems, including systems and methods for storing, searching, retrieving, and processing image, video, and other forms of multimedia information from the time the claimed invention was made to the present time.

6. I have carefully and thoroughly read U.S. Patent Application Serial No. 09/493,038 and the continuation application corresponding to U.S. Patent Application Serial No. 10/673,281 based thereon.

7. Claim 1, as presently pending, recites a method of searching or browsing multimedia data. This method includes (a) receiving reference multimedia data with a data structure including features of said reference multimedia data and weight information of said features, wherein said data structure includes reliability information indicating a reliability of

the weight information, (b) searching for said reference multimedia data using the features and the weight information, (c) receiving user feedback on a relevance of resultant multimedia data found in (b), (d) measuring a similarity of the reference multimedia data to the resultant multimedia data and calculating new weight information of said features using the measured value, and (e) updating the weight information of said features in said data structure of the reference multimedia data using the new weight information. The Wang patent does not teach or suggest this method.

8. The Wang patent discloses a method of searching for images stored in a database. This method includes receiving a search inquiry from a user which includes image attribute parameters indicative of a type of image to be retrieved from the database. Once the search has been performed, the images produced from the search are displayed on a monitor. The user then selects one or more of the most highly correlated images. The images produced from the search are then re-ranked and the image attribute parameters in the search inquiry are adjusted.

9. The Wang patent does not teach or suggest a data structure as recited in claim 1 which includes reliability information of any type, let alone reliability information which indicates a reliability of weight information corresponding to features of reference multimedia data included in the data structure.

10. Applicant's representatives have informed me that, in the latest Office Action, the patent examiner has relied on column 12, lines 62-66, of the Wang patent for disclosing a data structure having the reliability information recited in claim 1.

11. At column 12, lines 62-66, the Wang patent merely discloses three parameters (hue, saturation, value) that are used to portray the skin color of a face. These parameters are weighted (.5 hue, .3 saturation, .2 value) to reflect their significance to a face identification.

12. Thus, the weight information in Wang is assigned to determine the significance of the parameters (namely hue, saturation, and value) which has been indicated to correspond to the "features" recited in claim 1. Wang does not disclose reliability information indicating a reliability of the weight information itself, i.e., Wang does not disclose reliability information which indicates the reliability of the weights .5, .3, and .2 assigned to the parameters hue, saturation, and value. The remainder of the Wang patent also fails to disclose the reliability information recited in claim 1.

13. I have reviewed the secondary references cited in the Office Action mailed on September 8, 2006. None of these secondary references teaches or suggests the reliability information recited in claim 1.

14. Because none of the cited references, taken individually, discloses the reliability information recited in claim 1, I conclude that a combination of the cited references also omits this feature.

15. Claim 18 recites that "the reliability information is different from the variable information." Wang does not disclose these features at column 12 or any other portion of its specification, and neither do any of the secondary references.

16. Claims 29, 37, and 48 recite reliability information similar to that of claim 1 and therefore are distinguishable from Wang for similar reasons.

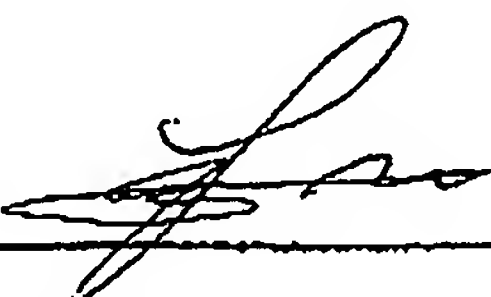
17. New claims 60 and 62-64 recite that the "reliability information is different from the weight information." These features are not disclosed, or otherwise taught or suggested, by the Wang patent, whether taken alone or in combination with the secondary references cited in the Office Action.

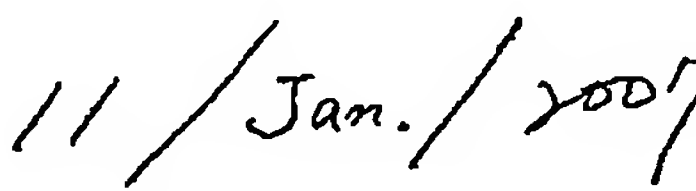
18. New claim 61 recites that the "reliability information is different from the variable information." These features are not disclosed, or otherwise taught or suggested, by the Wang patent, whether taken alone or in combination with the secondary references cited in the Office Action.

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19. I declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further, that these statements were made with the knowledge that wilful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, and that such wilful false statements may jeopardize the validity of the application or any patent issuing therefrom.



Mt. Jin-Soo Lee

Date

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